John Sharkey,

I feel that if IDWR requests that we install 5 ft. of casing into lava when $\frac{1}{2}$

overburden is encountered above rock there are only 2 ways of getting casing

into rock you either need to drill and drive a larger diameter casing with

drive shoe to the rock through the overburden then drill your larger diameter hole into rock install your smaller diameter casing into rock and

pull back and grout to surface, this method is very time consuming very strenuous on equipment and you do run risks of seperating the pipe depending

on how deep you would have to go to rock therefore there needs to be some

wording in the rules to give some leyway if problems were to occur during

this process. If underreaming is the method of choice to install casing 5

ft. into rock there needs to be something in the rules stating this method

is exceptable regardless of annullar space when the proper grout method is

used. Also I feel IDWR needs to put on some classes on how they would like

to see this grouting technique be done either with Halliburton or Cetco some

actual hands on tooling and methods. If you have any more questions please feel free to contact me at (208)357-1850 or (208)589-7195

Respectfully,

Kelly Bond owner of Teton Water Works